

PAUL J. RIEHLE (SBN 115199)
paul.riehle@faegredrinker.com
**FAEGRE DRINKER BIDDLE & REATH
LLP**
Four Embarcadero Center
San Francisco, California 94111
Telephone: (415) 591-7500
Facsimile: (415) 591-7510

GARY A. BORNSTEIN (pro hac vice)
gbornstein@cravath.com
YONATAN EVEN (pro hac vice)
yeven@cravath.com
LAUREN A. MOSKOWITZ (pro hac vice)
lmoskowitz@cravath.com
MICHAEL J. ZAKEN (pro hac vice)
mzaken@cravath.com
M. BRENT BYARS (pro hac vice)
mbyars@cravath.com
CRAVATH, SWAINE & MOORE LLP
375 Ninth Avenue
New York, New York 10001
Telephone: (212) 474-1000
Facsimile: (212) 474-3700

*Attorneys for Plaintiff and Counter-defendant
Epic Games, Inc.*

CYNTHIA E. RICHMAN (D.C. Bar No.
492089; *pro hac vice*)
crichman@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
1700 M Street, N.W.
Washington, D.C. 20036-4504
Telephone: 202.955.8500
Facsimile: 202.467.0539

MARK A. PERRY, SBN 212532
mark.perry@weil.com
JOSHUA M. WESNESKI (D.C. Bar No.
1500231; *pro hac vice*)
joshua.wesneski@weil.com
WEIL, GOTSHAL & MANGES LLP
2001 M Street NW, Suite 600
Washington, DC 20036
Telephone: 202.682.7000
Facsimile: 202.857.0940

Attorneys for Defendant Apple Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

EPIC GAMES, INC.

Plaintiff, Counter-defendant
v.

APPLE INC.,

Defendant, Counterclaimant

Case No. 4:20-cv-05640-YGR-TSH

**JOINT NOTICE WITH RESPECT TO
UNRESOLVED SEALING MOTIONS**

Courtroom: 1, 4th Floor

Judge: Hon. Yvonne Gonzalez Rogers

1 Pursuant to Your Honor's Order of July 29, 2025 (Dkt. No. 1660), Epic Games, Inc. ("Epic")
2 and Apple Inc. ("Apple") jointly state as follows:

3 Apple is maintaining in full its sealing applications at Dkt. Nos. 872, 893, 1067, 1329, 1543.

4 Epic takes no position on its administrative motions to consider whether another party's material
5 should be sealed, Dkt. Nos. 1152, 1304, 1355, and 1621. Apple is maintaining in full its statements in
6 support of these motions at Dkt. Nos. 1186, 1341, 1378, and 1638, respectively.

7 Apple is modifying its sealing application at Dkt. No. 916 to reflect that certain information has
8 now been made public. Apple is modifying its proposed redactions in Dkt. Nos. 916-3, 916-5, and 916-
9 7. The modified redactions are indicated in the versions attached to the parties' sealing stipulation.

10 Epic takes no position on its administrative motions to consider whether another party's material
11 should be sealed at Dkt. Nos. 922 and 926. Apple is modifying its statement in support of these motions,
12 *see* Dkt. No. 933, to reflect that certain information has now been made public. Apple is modifying its
13 proposed redactions in Dkt. Nos. 922-1, 922-2, 926-1, and 926-2. The modified redactions are indicated
14 in the versions attached to the parties' sealing stipulation.

15 Epic is withdrawing its sealing request with respect to Dkt. No. 1035-1. Apple is modifying its
16 statement in support of sealing Dkt. No. 1035-2, *see* Dkt. No. 1037, to reflect that certain information
17 has now been made public. The modified redactions are indicated in the version attached to the parties'
18 sealing stipulation.

19 Apple is withdrawing its sealing application at Dkt. No. 1327 solely on the basis of the Court's
20 ruling denying Apple's motion to strike the redacted text from the record (*see* Dkt. No. 1508). Apple
21 maintains and does not waive its assertion of privilege over that material and reserves all rights to appeal
22 or otherwise challenge the Court's ruling.

23 Epic's Administrative Motion to Seal certain text in its Opposition to Apple's Motion to Strike,
24 *see* Dkt. No. 1366, is withdrawn in light of the Court's ruling denying Apple's motion to strike the
25 redacted text from the record, *see* Dkt. No. 1508. Apple's statement in support of sealing is withdrawn
26 for the same reason. *See* Dkt. No. 1384. Apple maintains and does not waive its assertion of privilege
27 over that material and reserves all rights to appeal or otherwise challenge the Court's ruling.

1 Dated: August 12, 2025

Respectfully submitted,

2 By: Mark A. Perry
3 Mark A. Perry

4 **WEIL, GOTSHAL & MANGES LLP**

5 Mark A. Perry
6 mark.perry@weil.com
7 Joshua M. Wesneski
8 joshua.wesneski@weil.com

9 2001 M Street NW, Suite 600
10 Washington, DC 20036
11 Telephone: 202.682.7000
12 Facsimile: 202.857.0940

13 **GIBSON, DUNN & CRUTCHER LLP**

14 Cynthia E. Richman
15 crichman@gibsondunn.com

16 1700 M Street, N.W.
17 Washington, D.C. 20036-4504
18 Telephone: 202.955.8500
19 Facsimile: 202.467.0539

20 *Attorneys for Defendant Apple Inc.*

1 Dated: August 12, 2025

Respectfully submitted,

2 By: Gary A. Bornstein

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4 **FAEGRE DRINKER BIDDLE & REATH**
5 **LLP**

6 Paul J. Riehle (SBN 115199)
paul.riehle@faegredrinker.com

7 Four Embarcadero Center
8 San Francisco, California 94111
9 Telephone: (415) 591-7500
Facsimile: (415) 591-7510

10 **CRAVATH, SWAINE & MOORE LLP**

11 Gary A. Bornstein (pro hac vice)
12 gbornstein@cravath.com
13 Yonatan Even (pro hac vice)
yeven@cravath.com
14 Lauren A. Moskowitz (pro hac vice)
lmoskowitz@cravath.com
15 Justin C. Clarke (pro hac vice)
jcclarke@cravath.com
16 Michael J. Zaken (pro hac vice)
mzaken@cravath.com
17 M. Brent Byars (pro hac vice)
mbyars@cravath.com

18
19 375 Ninth Avenue
New York, New York 10001
20 Telephone: (212) 474-1000
Facsimile: (212) 474-3700

21 *Attorneys for Plaintiff and Counter-defendant*
22 *Epic Games, Inc.*
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25
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E-FILING ATTESTATION

I, Mark Perry, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Mark A. Perry

Mark A. Perry